From: Christine Poore
To: Garyg Miller
Cc: Amy Legare; Anne Foster; Carlos Sanchez; Donald Williams; Matthew Charsky; Rafael Casanova; RobinM Anderson; Trey Flowers
Subject: Re: Gulfco ROD
Date: 09/02/2011 10:09 AM

Gary,
I do have some questions about this, and I'm guessing that my colleagues might as well. I think it's best that we discuss our concerns rather than send a series of emails back and forth. I look forward to discussing the site with you on Tuesday. Thanks,

Christine Poore
Superfund Site Assessment and Remedy Decision Branch
703-603-9022

▼ Garyg Miller---09/02/2011 10:57:57 AM---Christine, We plan to include in the Gulfco ROD why DNAPL treatment is not practicable or cost effec

From: Garyg Miller/R6/USEPA/US
To: Christine Poore/DC/USEPA/US@EPA
Cc: Rafael Casanova/R6/USEPA/US@EPA, Anne Foster/R6/USEPA/US@EPA, Donald Williams/R6/USEPA/US@EPA, Carlos Sanchez/R6/USEPA/US@EPA, Amy Legare/DC/USEPA/US@EPA, Matthew Charsky/DC/USEPA/US@EPA, RobinM Anderson/DC/USEPA/US@EPA, Trey Flowers/DC/USEPA/US@EPA
Date: 09/02/2011 10:57 AM
Subject: Gulfco ROD

Christine,

We plan to include in the Gulfco ROD why DNAPL treatment is not practicable or cost effective, and that there is uncertainty regarding risk reduction that any proposed treatment for the remaining DNAPL would achieve. In addition, additional information/detail will be added regarding the source control completed in 1982 when the former impoundments were closed in accordance with a state approved plan.

While we do not believe that there is any mobile DNAPL present, and therefore it is not a principle threat waste, the Region feels that the following approach will resolve your concerns. Currently, Alternative 3 (Groundwater Containment) in the ROD includes the installation/operation of groundwater recovery wells and a water treatment plant. This alternative would also be expected to recover some amount of DNAPL. It is proposed to add potential DNAPL recovery to the discussion of this alternative. DNAPL recovery would go towards the Remedial Action Objective of maintaining a stable groundwater plume because removal of this material will help prevent/minimize any future migration of the groundwater plume. A discussion of DNAPL will also be added to the 9-criteria evaluation of Alternative 3. This 9-criteria discussion will recognize that a residual DNAPL mass will remain even after extensive groundwater recovery. This analysis will explain why a pump and treat remedy would likely be ineffective. Following this 9-criteria discussion, Alternative 2 could be selected for the same reasons as before. Adding a DNAPL recovery component to Alternative 3 in the ROD will be a difference from the Proposed Plan. This could

addressed in the change section of the ROD by noting that the recovery wells and treatment plant, costs, etc., discussed in the Proposed Plan are unchanged, and the ROD simply recognizes that DNAPL may be recovered at the same time with the water extraction.

The cap over the former impoundments, which was built during a State approved closure action in 1982, is necessary to meet several of the Remedial Action Objectives, including plume stability (reduce infiltration & therefore reduce plume migration), as well as preventing future exposures to remaining waste materials in the former impoundments. Based on a recommendation from HQs, this existing cap was included as a component of the remedial action alternatives to make it a part of the CERCLA action since it is an important component of the Site's overall long-term protectiveness. There is no current program for cap maintenance/repair, and if that is not done over the long term, then the Site protectiveness could not be ensured.

Regarding the institutional controls, they are required, in part, to ensure that the land use that was used in the risk assessment is maintained. The risk assessment for both the north & south areas was done for a commercial/industrial land use. This land use is consistent with the past land use, and is also consistent with the zoning rules in effect for the Site. In addition, the Site is valuable for industrial use due to the existing barge slips because new barge slips can no longer be dredged. While the expected future land use is industrial, consistent with past EPA practice, the institutional controls will help ensure that the assumptions used in the risk assessment are maintained, and their effectiveness will be improved by "layering" with the zoning rules.

Please let us know if you have any questions on this.

Regards,

Gary Miller, P.E.
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